

1864

SUMMONS

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon the MIAMI ROOFING & SHEET METAL COMPANY OF MIAMI, FLORIDA, to appear within thirty days from the service of this writ in the Circuit Court, to be held for said county at the place of holding the same, then and there to answer the complaint of ROBERT GODSEY, doing business as the GATEWAY HOTEL.

Witness my hand this the 17th day of September, 1952.

W. J. French  
Clerk

ROBERT GODSEY, doing business  
as GATEWAY HOTEL,

PLAINTIFF

VS:

MIAMI ROOFING & SHEET METAL  
COMPANY OF MIAMI, FLORIDA,

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

COUNT I:

The plaintiff claims of the defendant the sum of THREE HUNDRED FORTY FIVE & 14/100 DOLLARS (\$345.14) due from it by account on the 17th day of September, 1952, for hotel room rent, which sum of money, with interest thereon is still due and unpaid.

Wm. J. French  
Attorney for Plaintiff

There is attached hereto and made a part hereof an itemized statement of account verified by the plaintiff in this case.

Wm. J. French

H. C. Scarborough, Jr., vice president of  
the Miami Roofing & Sheet Metal Company is  
staying at the Gateway Hotel, Foley, Alabama.

Executed Sept, 19, 1952

By Serving Copy on

H. C. Scarborough

1864 RECORDED

Robert Godsey 8/6/2  
Gateway Hotel

VS

Miami Roofing &  
Sheet Metal Co

Summons & Compt

Shriff  
Taylor Welkno  
By  
Edleigh Steadham

H. C. Scarborough

FILED

SEP 19 1952

SEP 1 1952

512439

WRIT OF ATTACHMENT

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

WHEREAS, Forest A. Christian, hath complained on oath to me, ALICE J. DUCK, Clerk of the Circuit Court of Baldwin County, that MIAMI ROOFING & SHEET METAL COMPANY of Miami, Florida, is justly indebted to ROBERT GODSEY, doing business as GATEWAY HOTEL in the sum of \$345.14; and the said ROBERT GODSEY, doing business as GATEWAY HOTEL having made affidavit and no bond being required in such cases: You are hereby commanded to attach so much of the estate of the said MIAMI ROOFING & SHEET METAL COMPANY as will be of value to satisfy the said debts and costs, according to the complaint; and such estate, unless replevied, so to secure that the same may be liable to further proceedings thereon, to be had at the present term of the Circuit Court of Baldwin County, to be held at the Court House thereof, where and when you must make known how you have executed this writ.

Witness, ALICE J. DUCK, Clerk of said Court, my hand, this the 19th day of September, 1952.

Alice J. Duck  
Clerk

Executed Sept, 19, 1952

By Sending copy on

H. C. Scarborough

and attaching one  
1951 Ford half ton  
Pickup

Tag No 5<sup>H</sup>-2439

Sheriff

Taylor Wilkins

By

Edleigh Steadham

1864

RECORDED  
Robert Howard/p/c  
Gateway Hotel

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Miami Roofing &  
Sheet Metal Co

Attachment

SEP 19 1952

SEP 1 1952

ROBERT GODSEY, doing business  
as GATEWAY HOTEL,

PLAINTIFF

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALA.

vs

AT LAW

MIAMI ROOFING & SHEET METAL  
COMPANY OF MIAMI, FLORIDA,

DEFENDANT

Now comes the Defendant in the above styled cause and  
for answer to the complaint filed therein saeth:

1. The allegations of the complaint are untrue.

  
Attorney for Defendant

RECORDED  
ANSWER

ROBERT GODSEY, doing business  
as GATEWAY HOTEL,

PLAINTIFF

VS

MIAMI ROOFING & SHEET METAL  
COMPANY OF MIAMI, FLORIDA.

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALA.

AT LAW

FILED

SEP 22 1952

ALICE J. DUCK, Clerk

LAW OFFICE OF  
FOREST A. CHRISTIAN  
FOLEY, ALABAMA  
September 19, 1952

Mrs. Alice J. Duck  
Clerk of Court  
Bay Minette, Alabama

Re: George Ingram, d/b/a Ingram  
Electric  
Vs: Miami Roofing & Sheet Metal  
Company of Miami, Florida

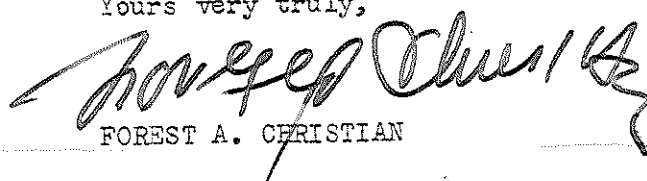
Dear Mrs. Duck:

You are authorized and instructed to dismiss the case and attachment of George Ingram, doing business as Ingram Electric, case number 1865, the case having been settled.

I am enclosing my check number 1952 to pay for the court costs.

Thank you for assisting me this morning.

Yours very truly,

  
FOREST A. CHRISTIAN

FAC:jg

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1864



**CECIL G. CHASON**

ATTORNEY AT LAW  
FOLEY, ALABAMA

20 Sept 1952

Mrs. Alice J. Duck,  
Clerk of Court,  
Bay Minette, Ala.

Dear Mrs. Duck:

There is enclosed herewith an answer in the case of Godsey vs Miami Roofing. A copy of this answer is being sent to Mr. Christian, however please give notice in accordance with the provisions of Section 849 of Title 7 of the Code of 1940.

Yours,

cc: Forest Christian

  
C. G. Chason

AFFIDAVIT FOR ATTACHMENT

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

Before me, ALICE J. DUCK, Clerk of the Circuit Court of Baldwin County, personally appeared Forest A. Christian, who being duly sworn, deposes and says as follows:

That MIAMI ROOFING & SHEET METAL COMPANY of Miami, Florida is justly indebted to said ROBERT GODSEY, doing business as GATEWAY HOTEL in the sum of THREE HUNDRED FORTY FIVE & 14/100 DOLLARS (\$345.14), which said amount is justly due, and that the said MIAMI ROOFING & SHEET METAL COMPANY resides out of the state, and that this attachment is not sued out for the purpose of vexing or harassing the said defendant.

Forest A. Christian  
Affiant

Sworn to and subscribed before me this  
the 19th day of September, 1952.

Alice J. Duck  
Clerk

AFFIDAVIT FOR ATTACHMENT

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

Before me, ALICE J. DUCK, Clerk of the Circuit Court of Baldwin County, personally appeared Forest A. Christian, who being duly sworn, deposes and says as follows:

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Forest A. Christian  
Affiant

Sworn to and subscribed before me this  
the 19th day of September, 1952.

Alice J. Duck  
Clerk

# GATEWAY HOTEL

*Open Year Round*

**FOLEY, ALABAMA**

SEPTEMBER 18. 1952

MIAMI ROOFING AND SHEET METAL CO.

7300 1st. Pl. N. E.

MIAMI, FLA.

REP:

H.C. SCARBOROUGH

ROOMS # 3-4

RENTED ON APRIL 20th , 1952. SPECIAL RATE, \$40.00 PER  
WEEK. ROOMS TO BE OCCUPIED BY H, C. SCARBOROUGH AND  
R. M. MARKS, UNTIL COMPLETION OF JOB AT BARIN FIELD.  
UNLESS OTHERWISE NOTIFIED.

AMOUNT PAID ON ROOMS      \$ 554.25

BALANCE DUE                      \$345.14

ROOM RENT      \$325.70

ELECT. BILL \$1944

-----  
\$ 345.14 Total

Sworn to and subscribed  
before me, a Notary Public  
this the 18 day of  
September, 1952

SIGNED

  
Notary Public